

September 12, 2014

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: MB Docket Number 14-57

Ex parte presentation

Dear Ms. Dortch,

On behalf of the Coalition for Broadband Equity, I am submitting the attached copy of an email to Ms. Gigi Sohn, as a possible *ex parte* presentation to Commission staff in this proceeding.

Thank you.

Respectfully submitted,

William Callahan, Director Connect Your Community 2.0

On behalf of the Coalition for Broadband Equity

From: Bill Callahan [mailto:bill@connectyourcommunity.org]

Sent: Wednesday, September 10, 2014 9:14 PM

To: Gigi Sohn

Subject: Question re: appropriate ex parte request for Charter/SpinCo digital inclusion coalition

Ms. Sohn,

It was a pleasure to meet you at the OneCommunity meeting. I appreciate your willingness to point us in the right direction.

The Coalition for Broadband Equity includes OneCommunity, a half dozen community-based nonprofits in Cleveland and Detroit, the community colleges serving Cuyahoga and Lorain Counties, the Cuyahoga County and Youngstown/Mahoning County Public Libraries, and the City and Housing Authority of Milwaukee. These organizations have two things in common:

- If the Comcast/Time Warner merger is approved, our communities are all slated to be "divested" either to Charter Communications or to SpinCo/Greatlands. In other words, whatever one might think of Comcast Internet Essentials and its possibilities for future growth, none of our communities stand to benefit from it as a result of the proposed merger and associated divestments.
- We have all been been grantee/operators or partners in large-scale, successful digital training and broadband adoption efforts funded by the Broadband Technology Opportunities Program.

On August 25 the Coalition filed Initial Comments in the Comcast docket. We didn't oppose or support the Applications per se, but called attention to three substantive issues which we don't believe are being raised elsewhere, all related to the potential effects of divestment on low-income broadband adoption and access in our communities:

- the likelihood of thousands of current Internet Essentials enrollees in Detroit (and the Twin Cities, and elsewhere) having that option withdrawn if and when Comcast is replaced by SpinCo/Greatlands;
- the likelihood of Time Warner Internet customers in Ohio, Milwaukee and elsewhere losing access to a very affordable, non-promotional service tier if and when TWC is replaced by Charter; and
- 3. the fact that the Applications reflect no plans for Charter or SpinCo to address the critical issue of persistently low overall household broadband penetration in the central cities they propose to acquire. We included our analysis of recent FCC Form 477 census-tract data for six cities served by Coalition members to support our concerns about this.

My question is: With whom should request an ex parte meeting to discuss these issues and our supporting data?

Thanks for your help.

Bill Callahan, Director Connect Your Community 2.0 216-870-4736 http://connectyourcommunity.org